Law Offices of Beles & Beles 1 Manisha Daryani Bar no. 272992 One Kaiser Plaza, Suite 2300 2 Oakland, California 94612-3642 Tel No. (510) 836-0100 3 Fax. No. (510) 832-3690 beleslaw@yahoo.com 4 Attorneys for Defendant VICENTE ARELLANO-BUENROSTRO 5 6 **United States District Court** for the Northern District of California 7 San Francisco Courthouse 8 UNITED STATES OF AMERICA, No. 22-CR-191-JSC 9 Plaintiff, UNOPPOSED MOTION AND [PROPOSED] ORDER TO 10 MODIFY CONDITIONS OF PRE-TRIAL RELEASE VS. 11 VICENTE ARELLANO-BUENROSTO AND JUAN ARELLANO, 12 13 Defendants. 14 UNOPPOSED MOTION AND [PROPOSED] ORDER TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE 15 Defendants Vicente Arellano-Buenrosto and Juan Arellano respectfully move this Court to 16 modify their conditions of pretrial release to permit Mr. Juan Arellano to attend the baptism of the son 17 of Mr. Vicente Arellano-Buenrosto. The baptism is scheduled for June 4, 2022 at 11:00 am at Saint 18 Joseph Catholic Church in Mountain View. 19 Specifically, the defendants request that the Court modify the conditions as follows: 20 1) Mr. Vicente Arellano-Buenrosto and Mr. Juan Arellano are permitted to have contact with 21 22 each other in the days leading up to and including the baptism on June 4, 2022, which shall include in-person and telephonic contact. However, during this time, Mr. Vicente Arellano-Burenrosto and Mr. 23 24 Juan Arellano are not permitted to discuss the instant case with each other. 2) Mr. Juan Arellano is permitted to attend the baptism in Mountain View, California on June 25 4, 2022 at the specific address already provided to the supervising pre-trial services officer. Mr. Juan 26 Arellano is also permitted to attend the dinner after the ceremony at the home of Mr. Vicente Arellano-27 28 Buenrosto.

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| | ORIGINAL | | |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 1 | The Assistant United States Attorney, Zachary Abrahamson, does not object to this motion. | | |
| 2 | Additionally, Pre Trial Services has no objection | Additionally, Pre Trial Services has no objection to this motion. | |
| 3 | All other conditions of pretrial release are to remain the same. | | |
| 4 5 | DATE: June 2, 2022 MA | /s/ Manisha Daryani NISHA DARYANI orney for VICENTE ARELLANO-BUENROSTRO | |
| 6 7 8 | 6 DATE: June 2, 2022 SHA | /s/ Shaffy Moeel AFFY MOEEL orney for JUAN ARELLANO | |
| 9 | [PROPOSED] ORDER | | |
| 1 | Based upon the facts set for in the instant | Based upon the facts set for in the instant motion, IT IS HEREBY ORDERED that each of the defendants' terms of pretrial release shall be modified as requested above. IT IS SO ORDERED. | |
| 12 | defendants' terms of pretrial release shall be mod | | |
| 13 | IT IS SO ORDERED. | | |
| 14 | DATED: | | |
| 15 16 | | SALLIE KIM United States Magistrate Judge | |
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| Unopposed Motion and [Proposed] Order for Modification of | | | |